

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DAVID JAMES SEABOLT, JR.,

Defendant.

CRIMINAL NO. **JTB-16-0601**

**(Distribution of Child Pornography,
18 U.S.C. § 2252(a)(2); Possession of
Child Pornography, 18 U.S.C.
§ 2252(a)(4)(B) & (b)(2); Aiding and
Abetting, 18 U.S.C. § 2; Forfeiture, 18
U.S.C. §§ 2253 & 2428)**

INDICTMENT

COUNT ONE

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about June 26, 2015, in the District of Maryland, the defendant,

DAVID JAMES SEABOLT, JR.,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped, and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, the defendant distributed a video depicting a prepubescent minor female performing oral sex on an adult male's erect penis.

18 U.S.C. §§ 2252(a)(2),(b)(1) and 2256
18 U.S.C. § 2

COUNT TWO

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

From on or about January 2012 through on or about September 2, 2015, in the District of Maryland, the defendant,

DAVID JAMES SEABOLT, JR.,

did knowingly possess and knowingly access with intent to view one or more matters which contained any visual depiction that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, that is, the defendant possessed a Diablotek Desktop Computer, s/n: MD1305BB8987, containing a Seagate Barracude 500 GB hard drive, s/n: W2A708EN, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252(a)(4)(B),(b)(2) and 2256

COUNT THREE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about September 2, 2015, in the District of Maryland, the defendant,

DAVID JAMES SEABOLT, JR.,

did knowingly possess and knowingly access with intent to view one or more matters which contained any visual depiction that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, that is, the defendant possessed a Western Digital 500 GB External Hard Drive, s/n: WCAUK1452855, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252(a)(4)(B),(b)(2) and 2256

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Counts One through Three of this Indictment are incorporated here.

2. As a result of the offenses set forth in Counts One through Three of the Indictment, the defendant,

DAVID JAMES SEABOLT, JR.,

shall forfeit to the United States his interest in all property, real and personal, that was used and intended to be used to commit and to promote the commission of offenses in Counts One through Three, and any property traceable to such property, including but not limited to the following:

- a. Diablotek Desktop Computer, s/n: MD1305BB8987, containing a Seagate Barracude 500 GB hard drive, s/n: W2A708EN, product of China;
- b. Acer Aspire Notebook Computer, s/n: LUSAL0D277016017871601, containing a Hitachi 160 GB hard drive, s/n: ECG9DRMH, product of Thailand;
- c. Western Digital 500 GB External Hard Drive, s/n: WCAUK1452855, product of Thailand;

as well as any property used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

18 U.S.C. §§ 2253 & 2428



Rod J. Rosenstein
United States Attorney

A TRUE BILL — — —

SIGNATURE REDACTED

Date: February 23, 2016